

January 30, 2004

Charles C. S. Iannello, Senior Economist
Energy Division – Policy Program
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Subject: Illinois Commerce Commission Distributed Generation Interconnection Draft Documents

Dear Mr. Iannello:

In response to your request for comments on the subject documents, the undersigned - energy industry research organizations, educational institutions, and sustainable energy organizations - have prepared the attachments with recommendations to assist with the development of an interconnection standard that:

- Minimizes the time required to complete the interconnection process
- Reduces the complexity of the process
- Establish technical requirements and standard designs that will promote the safe and reliable parallel operation of DG equipment while lowering costs and simplifying the process.
- Establishes fair methods for addressing conflicts
 - Creation of a well defined Dispute Resolution Mechanism
 - Establish an Independent Technical Review Board, made up of both utility engineers and engineering professionals from the DG community.
 - Provide for appropriate financial and/or other commercial incentives for meeting deadlines; or appropriate penalties for failure to meet deadlines

We applaud the staff of the Illinois Commerce Commission for their work to date in initiating the process to develop a Statewide Standard for the interconnection of distributed generation resources to the electric utility transmission / distribution grid. Industry is pleased to have the opportunity to submit comments regarding the initial documents that have been generated in this process:

- Draft Rule
- Draft Interconnection Agreement
- Two Interconnection Applications

These documents establish a process for obtaining grid interconnection approval, while at the same time providing terms and conditions that will govern the application, review, and legal

agreement process to be followed by both the electric utility (as defined by the Illinois Public Utilities Act) and the customer applying for interconnection to the utility grid.

Illinois utilities currently have processes that address interconnection of small generation to the electric grid. We concur with the need to improve these processes. We also recognize that without careful consideration, the process could become more cumbersome and costly. As such, we suggest that the ICC carefully consider our comments as they are designed to ensure that each section and requirement contribute to streamlining and improving the process.

Attached is a summary of our comments that are consistent with the mutual goals of the ICC staff, utilities, and industry. Industry appreciates the opportunity to provide comments. Industry also offers to work closely with the staff, utilities, and others to continue to improve and expand upon this first draft of an interconnect standard. We look forward to reviewing the formal draft proposed rules that the ICC intends to issue in the near future. Please feel free to contact John Kelly who is coordinating comments for Industry at 847-768-0665.

Sincerely,

Joseph Sinclair	President	Ballard Engineering, Inc.
John Whitehouse	Business Development - Distributed Generation	Cummins NPower, LLC
Barry Kreuzer	Regional Manager	Cummins Power Generation
Darrell Thornley	Central Region Manager	Encorp, Inc.
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Rob Thorton	Executive Director	International District Energy Association
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Bill Prindle	Deputy Director	The American Council for an Energy- Efficient Economy (ACEEE)
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